

SDNY (Rev. 10/2006) Pro Hac Vice Motion to Admit Counsel

received

7/10/07

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

RICHARD ELLO Plaintiff,

- against -

ISHRY SINGH, ET AL. Defendant.

05 cv 9625 (KMK)

MOTION TO ADMIT COUNSEL

PRO HAC VICE

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the

Southern and Eastern Districts of New York, I, RUTH MARIE POLLACK, member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name: WENDY B. BROWER

Firm Name: N/A

Address: 276 1<sup>st</sup> Ave Apt 11C

City/State/Zip: NY, NY 10009-1860

Phone Number: c/o Ruth Pollack - 516-746-0146

Fax Number: -

WENDY B. BROWER

is a member in good standing of the Bar of the States of

There are no pending disciplinary proceeding against WENDY B. BROWER in any State or Federal court.

Dated: June 23, 2007

City, State: Riverhead, New York

Respectfully submitted,

Sponsor's

SDNY Bar RP1407

Firm Name: Ruth M. Pollack, ESQ.

Address: P.O. Box 120

City/State/Zip: Riverhead, N.Y. 11901-0120

Phone Number: 516-746-0146

Fax Number: 516-746-8008

ORIGINAL

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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RICHARD ELLO,

Plaintiff,

- against -

ISHRY SINGH, et al.

Defendant.

05cv9625(KMK)  
AFFIRMATION OF  
RUTH M. POLLACK, ESQ.  
IN SUPPORT OF MOTION  
TO ADMIT COUNSEL  
PRO HAC VICE

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Ruth M. Pollack, an attorney duly admitted to practice law in this State, being mindful of the penalties for perjury, affirms as follows:

1. I am counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Wendy B. Brouwer as counsel **pro hac vice** to represent Plaintiff in this case.
2. I am a member in good standing of the Bar of the State of New York and was admitted to practice law in 1983. I am also admitted to the bar of the United States District Court for the Southern, Northern and Eastern Districts of New York, and am in good standing with all of these Courts.
3. I have known Ms. Brouwer since 2006.
4. Ms. Brouwer retired from the Federal Bureau of Investigation in 2004, after serving for almost 22 years as a special agent.
5. Ms. Brouwer has been assisting me in above captioned action and I have found her to be a skilled investigator and diligent attorney, and a person of integrity. She is familiar with Federal practice and the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Wendy B. Brouwer, **pro hac**

**vice.**

7. I respectfully submit a proposed order granting the admission of Wendy B.

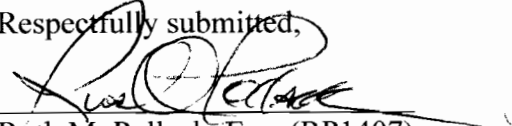
Brouwer, **pro hac vice**, which is attached hereto as Exhibit A. Ms. Brouwer's original certificate of good standing is annexed hereto as Exhibit "B".

WHEREFORE, it is respectfully requested that the motion to admit Wendy B. Brouwer,

**pro hac vice**, to represent Plaintiff in the above captioned matter, be granted.

*June 23*  
Dated: ~~April 22~~, 2007 *(Rmp)*  
Mineola, New York

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Respectfully submitted,  
  
Ruth M. Pollack, Esq. (RP1407)

**Appellate Division of the Supreme Court  
of the State of New York  
First Judicial Department**

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I, David Spokony, Deputy Clerk of the Appellate Division of the Supreme Court of the State of New York, First Judicial Department, certify that

**WENDY B. BROUWER**

was duly licensed and admitted to practice as an Attorney and Counsellor at Law in all the courts of the State of New York on the 19th day of June, 1989 has duly taken and subscribed the oath of office prescribed by law, has been enrolled in the Roll of Attorneys and Counsellors at Law on file in my office, has duly registered with the administrative office of the courts, and according to the records of this court is in good standing as an attorney and counsellor at law.

In Witness Whereof, I have hereunto set my  
hand and affixed the seal of this court on

June 21, 2007



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Deputy Clerk

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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**RICHARD ELLO,**

Plaintiff,

*-Versus-*

**LABORERS' INTERNATIONAL UNION OF NORTH  
AMERICA;**

**MASON TENDERS DISTRICT COUNCIL OF GREATER  
NEW YORK;**

**MASON TENDERS DISTRICT COUNCIL TRUST FUNDS;**

**GREATER NEW YORK LABORERS-EMPLOYERS  
COOPERATION AND EDUCATION TRUST FUND;**

**RAYMOND POCINO**, in his individual and official capacities as

- Vice President and Eastern Regional Manager, LABORERS' INTERNATIONAL UNION OF NORTH AMERICA,
- Trustee, MASON TENDERS DISTRICT COUNCIL TRUST FUNDS;

Case Number:  
**05cv9625(KMK)**

**PROSKAUER ROSE LLP;**

**ISHRY SINGH**, in his individual and official capacities as,

- Employee of MASON TENDERS DISTRICT COUNCIL TRUST FUNDS;

**JOHN VIRGA**, in his individual and official capacities,

- Funds Director, MASON TENDERS DISTRICT COUNCIL TRUST FUNDS;

**"JOHN AND JANE DOE A THROUGH D"**, parties unknown,

Defendants.  
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**CERTIFICATION OF SERVICE**

RUTH M. POLLACK, ESQ. an attorney duly licensed to practice law in this Court and in the State of New York, being mindful of and under the penalties for perjury declares:

On July 3, 2007 declarant served the following counsel with a copy of the annexed application for *Pro Hac Vice* Admission (Proposed Order, Affirmation, Notice of Motion, Certificate of Good Standing for Wendy Brower by U.S. Mail service by placing a postage paid envelope placed in a repository for that purpose addressed as follows:


Kathleen M. McKenna, Esq.  
Deirdre A. Grossman, Esq.

Proskauer Rose LLP  
1585 Broadway  
New York, NY 10036

Samuel Rosenthal, Esq.  
Curtis, Mallet-Prevost, Colt & Mosle, LLP  
101 Park Avenue  
New York, NY 10178

Terrence G. Reed, Esq.  
Lankford, Coffield & Reed, PLLC  
120 North Asaph Street  
Alexandria VA 22314

Dated: Riverhead, New York  
July 3, 2007

  
RUTH M. POLLACK, ESQ. (RP1407)  
Attorney for Plaintiff Richard Ello

ECF Doc: \_\_\_\_\_